

ORIGINAL INTERVENTION



0000166354

BEFORE THE ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION
DOCKET CONTROL

SUSAN BITTER SMITH
CHAIRMAN
BOB STUMP
COMMISSIONER
BOB BURNS
COMMISSIONER
DOUG LITTLE
COMMISSIONER
TOM FORESE
COMMISSIONER

IN THE MATTER OF THE APPLICATION OF
ARIZONA PUBLIC SERVICE COMPANY
FOR APPROVAL OF ITS 2016 RENEWABLE
ENERGY STANDARD IMPLEMENTATION
PLAN AND REQUEST FOR RESET OF
RENEWABLE ENERGY ADJUSTOR.

Docket No. E-01345A-15-0241

RUCO'S APPLICATION TO INTERVENE

I.

The RESIDENTIAL UTILITY CONSUMER OFFICE ("RUCO") hereby applies to the
Arizona Corporation Commission ("Commission") for an Order granting it leave to
intervene in the above-captioned proceeding.

II.

RUCO was established by the enactment of Arizona Revised Statutes, Section 40-
461, *et seq.*, for the purpose of representing residential utility consumers in matters before
the Commission concerning regulated public service corporations.

Arizona Corporation Commission

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WJ

1 III.

2 Arizona Revised Statutes, Section 40-464.A.2., specifically provides that the
3 Director of RUCO may do the following:

4 Prepare and present briefs, arguments, proposed rates or
5 orders and intervene or appear on behalf of residential utility
6 consumers before hearing officers and the Corporation
7 Commission as a party in interest and also participate as a
8 party in interest pursuant to Section 40-254 in proceedings
9 relating to rate making or rate design and involving public
10 service corporations.

11 IV.

12 The residential utility consumers will be directly and substantially affected by a
13 Decision or Order of the Commission in this matter, therefore, it is necessary and proper
14 that RUCO intervene in the proceeding.

15 V.

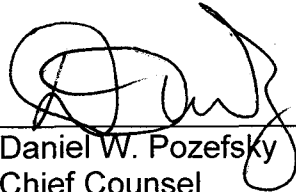
16 In order to fulfill its statutory obligation to protect the residential utility consumers of
17 this State, RUCO must thoroughly examine the materials presented by the Company, and
18 must cross-examine witnesses appearing on behalf of the Company and any other parties.
19 Additionally, RUCO may present testimony and exhibits of its own in any hearings
20 conducted by the Commission in this matter.

21 VI.

22 The name, mailing address, and telephone number of the person upon whom
23 service of all documents is to be made is:
24

1 Daniel W. Pozefsky
2 Chief Counsel
3 Residential Utility Consumer Office
4 1110 West Washington, Suite 220
5 Phoenix, Arizona 85007
6 (602) 364-4839

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10 RESPECTFULLY SUBMITTED this 5th day of October, 2015.

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Daniel W. Pozefsky
Chief Counsel

10 AN ORIGINAL AND THIRTEEN COPIES
11 of the foregoing filed this 5th day
12 of October, 2015 with:

12 Docket Control
13 Arizona Corporation Commission
14 1200 West Washington
15 Phoenix, Arizona 85007

15 COPIES of the foregoing hand delivered/
16 mailed this 5th day of October, 2015 to:

16 Dwight Nodes
17 Hearing Division
18 Arizona Corporation Commission
19 1200 West Washington
20 Phoenix, Arizona 85007

Melissa Krueger
Pinnacle West Capital Corporation
400 N. 5th Street, Suite 8695
Phoenix, AZ 85004

19 Janice Alward
20 Legal Division
21 Arizona Corporation Commission
22 1200 West Washington
23 Phoenix, Arizona 85007

Garry Hays
1702 E. Highland Ave., Suite 204
Phoenix, Arizona 85016

22 Thomas Broderick
23 Utilities Division
24 Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

By 